

Gregory D. Miller  
Gene Y. Kang  
Jenna Z. Gabay  
**RIVKIN RADLER LLP**  
21 Main Street, Suite 158  
Court Plaza South – West Wing  
Hackensack, New Jersey 07601-7021  
Telephone: (201) 287-2460

Betty Chen (admitted *pro hac vice*)  
**FISH & RICHARDSON P.C.**  
500 Arguello Street, Suite 500  
Redwood City, California 94063  
Telephone: (650) 839-5070

Susan E. Morrison (admitted *pro hac vice*)  
**FISH & RICHARDSON P.C.**  
222 Delaware Avenue  
17th Floor, P.O. Box 1114  
Wilmington, DE 19801  
Telephone: (302) 652-5070

Christopher O. Green (admitted *pro hac vice*)  
Sara C. Fish (admitted *pro hac vice*)  
**FISH & RICHARDSON P.C.**  
1180 Peachtree Street NE, 21st Floor  
Atlanta, Georgia 30309  
Telephone: (404) 892-5005

Karrie E. Wheatley (admitted *pro hac vice*)  
**FISH & RICHARDSON P.C.**  
1221 McKinney Street, Suite 2800  
Houston, Texas 77010  
Telephone: (713) 654-5300

*Attorneys for Plaintiffs/Counterclaim-  
Defendants, Sun Pharma Global FZE and  
Sun Pharmaceutical Industries, Inc.*

Eric I. Abraham  
**HILL WALLACK LLP**  
21 Roszel Road  
Princeton, New Jersey 08540  
Telephone: (609) 924-0808

William A. Rakoczy (admitted *pro hac vice*)  
Paul J. Molino (admitted *pro hac vice*)  
Rachel P. Waldron (admitted *pro hac vice*)  
Conly S. Wythers (admitted *pro hac vice*)  
Katie A. Boda (admitted *pro hac vice*)  
**RAKOCZY MOLINO MAZZOCHI SIWIK LLP**  
6 West Hubbard Street, Suite 500  
Chicago, Illinois 60654  
Telephone: (312) 527-2157

*Attorneys for Defendants/Counterclaim-  
Plaintiffs, Lupin Ltd. and Lupin  
Pharmaceuticals, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

SUN PHARMA GLOBAL FZE and SUN  
PHARMACEUTICAL INDUSTRIES, INC.,

*Plaintiffs/Counterclaim-Defendants,*

v.

LUPIN LTD. and LUPIN  
PHARMACEUTICALS, INC.,

*Defendants/Counterclaim-Plaintiffs.*

Civil Action No. 3:18-cv-02213-FLW-TJB

**NOTICE OF MOTION  
TO SEAL**

**TO: ALL COUNSEL**

**PLEASE TAKE NOTICE** that on September 16, 2019, at 10:00 a.m. or as soon thereafter as counsel may be heard, Plaintiffs/Counterclaim-Defendants, Sun Pharma Global FZE and Sun Pharmaceutical Industries, Inc. (collectively, “Sun”) and Defendants/Counterclaim-Plaintiffs, Lupin Ltd. and Lupin Pharmaceuticals, Inc. (collectively, “Lupin”), through their respective attorneys herein, will respectively move before this Court for an Order sealing Sun and Lupin’s Confidential and/or Highly Confidential Information in:

- Letter from Eric I. Abraham, Esq., dated July 8, 2019 (D.E. 70);
- Letter from Plaintiffs/Counterclaim Defendants Sun Pharma Global FZE and Sun Pharmaceutical Industries, Inc. (“Plaintiffs” or “Sun”) to the Hon. Tonianne J. Bongiovanni, U.S.M.J. re Motion to Compel, dated July 8, 2019 and the accompanying exhibits A through C (respectively, D.E. 71, 71-1, 71-2, and 71-3);
- Letter from Plaintiffs to the Hon. Tonianne J. Bongiovanni, U.S.M.J. re Motion to Compel, dated July 15, 2019 and the accompanying exhibits A, B, and D through I (respectively, D.E. 76, 76-1, 76-2, 76-4, 76-5, 76-6, 76-7, 76-8, and 76-9);

- Letter from Lupin to the Hon. Tonianne J. Bongiovanni, U.S.M.J. re Sun's Motion to Compel, dated July 18, 2019 and the accompanying exhibits B and C (respectively, D.E. 79, 79-2, and 79-3);
- Letter Order from Hon. Tonianne J. Bongiovanni, U.S.M.J. re Plaintiffs' Motion to Compel, dated July 19, 2019 (D.E. 80);
- Letter from Defendant, Lupin, dated July 23, 2019, and Exhibits A – M annexed thereto (respectively, D.E. 84, 84-1 to -14);
- Letter from Sun to the Hon. Tonianne J. Bongiovanni, U.S.M.J., dated July 26, 2019, and Exhibits B and F annexed thereto (respectively, D.E. 89, 89-2, and 89-6);
- Exhibits A and B to the Letter from Sun to the Hon. Tonianne J. Bongiovanni, U.S.M.J., dated August 1, 2019 (respectively, D.E. 91-1, and 91-2); and
- Letter from Lupin to the Hon. Tonianne J. Bongiovanni, U.S.M.J., dated August 8, 2019, and Exhibits A and B annexed thereto (respectfully, D.E. 93, 93-1, and 93-2).

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Civil Rule 7.1(d)(4) and 5.3(c)(1), no legal brief is required and all relevant information required by Local Civil Rule 5.3(c)(3) has been set forth in the accompanying Declarations of Gregory D. Miller and Eric I. Abraham.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is also submitted herewith for the Court's consideration in accordance with Local Civil Rule 7.1(e).

**PLEASE TAKE FURTHER NOTICE** that all parties consent to the relief requested herein.

Dated: August 16, 2019

By: s/Gregory D. Miller

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Jenna Z. Gabay  
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